



MEMO ENDORSED

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VIA ECF

June 11, 2018

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The Hon. Katherine Polk Failla
U.S. District Court Judge
U.S. District Court for the Southern District of New York
40 Foley Square
New York, NY 10007

Re: Estate of Yonadav Hirshfeld, et al. v. Bank of China, 1:18-cv-1982 (KPF)

Dear Judge Failla:

We are counsel for Defendant Bank of China (“BOC”) in the above-referenced litigation, and we write on behalf of both sets of parties pursuant to Rule 2E of Your Honor’s Individual Rules of Practice in Civil Cases to request the following:

First, BOC requests an extension of the time to answer or otherwise respond to the Plaintiffs’ complaint. BOC’s answer or response currently is due tomorrow, Tuesday, June 12, 2018. We request an extension of that deadline to Monday, July 16, 2018. This is BOC’s first request for an extension. We require the additional time because counsel is awaiting further client instructions regarding BOC’s response to the complaint. Plaintiffs’ counsel consents to BOC’s request.

Second, Plaintiffs request an adjournment of the initial pre-trial conference, which is scheduled for July 11, 2018 at 3 p.m. (see Dkt. # 5.) Plaintiffs request an adjournment to a date after July 16, 2018. This is Plaintiffs’ first request for an adjournment. Plaintiffs seek an adjournment because Plaintiffs’ counsel has a conflict on July 11, 2018. BOC consents to Plaintiffs’ request.

By submitting this letter, BOC does not intend to waive, and is in fact not waiving, any



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defenses it may have.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'L. Saperstein', written in a cursive style.

Lanier Saperstein

Application GRANTED. Defendant's time to answer or otherwise respond to the Complaint is hereby extended to July 16, 2018. The initial pretrial conference currently scheduled in this matter is hereby ADJOURNED to July 31, 2018, at 11:00 a.m.

Dated: June 11, 2018
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading 'Katherine Polk Failla', written in a cursive style.

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE